

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

TOWANDA J. MAHONE,

Plaintiff,

v.

Civil Action No. 3:19-cv-00373-HEH

RIVER CITY RECOVERY, LLC

LOSS PREVENTION SERVICES, INC.

Defendants.

REQUEST FOR ENTRY OF DEFAULT

Now comes the Plaintiff, Towanda J. Mahone (“Mahone”), by counsel, and hereby requests the Clerk to enter a default against Defendant, River City Recovery, LLC (“River City”), on the basis that the record in this case demonstrates that there has been a failure to plead or otherwise defend as provided in Fed. R. Civ. P. 55(a).

Upon entry of default as to River City, Mahone, by counsel, will apply to the Court for a default judgment under Fed. R. Civ. P. 55(b)(2).

A declaration under penalty of perjury accompanies this request as “Exhibit 1.”

Respectfully submitted,

TOWANDA J. MAHONE

By /s/ Ian E. Vance
Counsel

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I, Ian E. Vance, of counsel for Towanda Mahone, certify that on July 11, 2019, the foregoing will be filed electronically with the ECF filing System of the U.S. District Court for the Eastern District of Virginia.

I further certify that I sent a copy of the foregoing (with exhibit) by regular mail, postage pre-paid to the following:

River City Recovery, LLC
James E. Kane – Registered Agent
2500 Austin Avenue
Richmond, VA 23223

River City Recovery, LLC
1313 E. Cary Street
Richmond, VA 23219

Loss Prevention Services, LLC
2976 Ivanrest Ave SW
Grandville, MI 49418

/s/ Ian E. Vance
Ian E. Vance